

## *EXHIBIT J*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both  
individually and as Legal Guardian of  
SHANE ALLEN LOVELAND, et al.,

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER  
COMPANY,

Defendant.

Case No. 8:18-cv-00127

**DECLARATION OF CLARK W. HEDGER IN SUPPORT OF  
THE GOODYEAR TIRE & RUBBER COMPANY'S MEMORANDUM IN SUPPORT OF  
ITS MOTION TO PRECLUDE PLAINTIFFS' REHABILITATION EXPERT, CRAIG  
LICHTBLAU, M.D., FROM OFFERING OPINIONS AT TRIAL FIRST DISCLOSED IN  
HIS MARCH 3, 2020 SUPPLEMENTAL EXPERT REPORT, AND TO PRECLUDE  
PLAINTIFFS' ECONOMIC EXPERT, BERNARD PETTINGILL, FROM OFFERING  
OPINIONS AT TRIAL FIRST DISCLOSED IN HIS SECOND SUPPLEMENTAL EXPERT  
REPORT SERVED ON MARCH 9, 2020**

I, Clark W. Hedger, declare as follows:

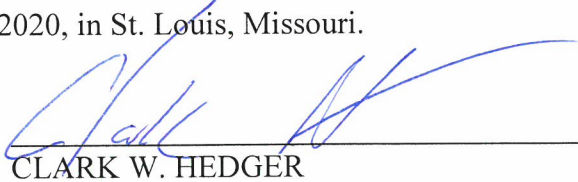
1. My name is Clark W. Hedger. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts stated herein are true and correct.

2. True and accurate copies of the documents identified in The Goodyear Tire & Rubber Company's Memorandum in Support of its Motion to Preclude Plaintiffs' Rehabilitation Expert, Craig Lichtblau, M.D., From Offering Opinions at Trial First Disclosed in His March 3, 2020 Supplemental Expert Report, and to Preclude Plaintiffs' Economic Expert, Bernard Pettingill, From Offering Opinions at Trial First Disclosed in His Second Supplemental Expert Report Served On March 9, 2020 are attached to the Index in Support of The Goodyear Tire & Rubber Company's Memorandum in Support of its Motion to Preclude Plaintiffs' Rehabilitation Expert, Craig

Lichtblau, M.D., From Offering Opinions at Trial First Disclosed in His March 3, 2020 Supplemental Expert Report, and to Preclude Plaintiffs' Economic Expert, Bernard Pettingill, From Offering Opinions at Trial First Disclosed in His Second Supplemental Expert Report Served On March 9, 2020.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11<sup>th</sup> day of March, 2020, in St. Louis, Missouri.



CLARK W. HEDGER